

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:21-cv-00285-JL
)	
JOHN J. FLATLEY d/b/a JOHN J. FLATLEY))	
COMPANY and LUKE PAGE,)	
)	
Defendants.)	
)	

ASSENTED-TO MOTION TO ENTER CONSENT DECREE

Pursuant to Local Rule 7.1 of the United States District Court for the District of New Hampshire, the United States requests that this Court approve and enter a consent decree that has been negotiated with respect to the defendants. In support of this motion, the United States states as follows:

1. The United States has reached an agreement to resolve this matter. This agreement, a proposed consent decree, is attached. The parties have executed an original version of this document. The parties request that this Court sign the Order attached to this consent decree.
2. The defendants assent to the relief requested in this motion.
3. Due to the nature of this motion, no memorandum of law is required.

For the reasons stated, the United States requests that this Court approve and enter the proposed consent decree.

Respectfully submitted,

JOHN J. FARLEY
Acting United States Attorney

By: /s/ Raphael Katz
Raphael Katz
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Dated: December 23, 2021

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of December, 2021, I served a copy of this assented-to motion to enter consent decree on all parties of record in this action, via ECF.

/s/ Raphael Katz
Raphael Katz, AUSA